




# MEMO

TO: Bernie Dailey, NSR Program Manager   
Chad Schlichtemeier, NSR Program Supervisor   
Solvay Minerals, AP-0631 file

FROM: Cortnie Morrell, Air Quality Engineer 

DATE: January 28, 2004

SUBJECT: Solvay AP-0631, VOC emissions

In the BACT analysis for control of VOC emissions from source #17, Solvay estimates the VOC emissions available for control as 1,121 tpy, based on a factor of 0.8 lbs/ton of ore and the capacity throughput of 320 tph for source #17. Solvay sites the application for permit CT-1347 in explaining the use of 0.8 lb/ton of ore. In looking at that application, it appears that the factor is the average VOC rate from testing conducted on sources #17 and #48 in 1995 and 1996. In the Division's analysis for CT-1347, the Division states, "The applicant and the Division consider the average expected emission rate more representative to calculate control costs as this is the expected rate on an annual basis and control costs are estimated on an annual average basis."

Solvay estimated total VOC emissions from source #17, using a factor of 1.94 lb/ton of ore, which is the maximum VOC result from the testing mentioned previously.